

(Caption of Case)

Re: Application of Sage Telecom, Inc. for a Certificate of Public Convenience and Necessity to Provide Facilities-based Local Exchange and Interexchange Telecommunications Services in the State of South Carolina

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET
NUMBER: 2007 - 337 - C

(Please type or print)

Submitted by: Margaret M. Fox, Esquire
Address: McNair Law Firm, P.A.
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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

- ☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously
- ☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:

MCNAIR LAW FIRM, P.A.

ATTORNEYS AND COUNSELORS AT LAW

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TELEPHONE (803) 799-9800
FACSIMILE (803) 376-2219

September 25, 2007

The Honorable Charles Terreni
Chief Clerk and Administrator
South Carolina Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211

RECEIVED
SEP 26 2007
SOUTH CAROLINA
PUBLIC SERVICE COMMISSION
COLUMBIA, SC 29211

Re: Application of Sage Telecom, Inc. for a Certificate of Public Convenience and Necessity to Provide Facilities-based and Resold Local Exchange and Interexchange Telecommunications Services in the State of South Carolina (SCPSC Docket No. 2007-337-C)

Dear Mr. Terreni:

Please find enclosed for filing on behalf of the South Carolina Telephone Coalition an original and ten (10) copies of a Petition to Intervene in the above-referenced docket. By copy of this letter and Certificate of Service appended to the Petition, I am serving all parties of record.

Please clock in a copy of the Petition and return it by our courier.

Should you have any questions with respect to this matter, please do not hesitate to contact me.

Very truly yours,



Margaret M. Fox

Enclosures

cc: Bonnie D. Shealy, Esquire
Florence P. Belser, Esquire

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OK D. D. Dille

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Docket No. 2007-337-C

FILED
JAN 10 2008
SOUTH CAROLINA
PUBLIC SERVICE COMMISSION

Re: Application of Sage Telecom, Inc. for a)
Certificate of Public Convenience and Necessity)
to Provide Facilities-based and Resold Local)
Exchange and Interexchange Telecommunications)
Services in the State of South Carolina)
_____)

**PETITION TO
INTERVENE**

In response to the Commission's Notice of the Filing of the Application of Sage Telecom, Inc. for a Certificate of Public Convenience and Necessity to provide local exchange telecommunications services in South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission.

2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.

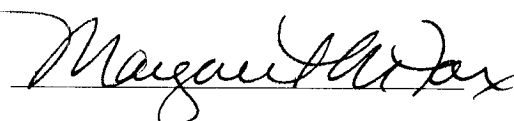
3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant local exchange telecommunications service providers is not appropriate and is not in the public interest. The Application, as currently drafted, would potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.
Margaret M. Fox
McNAIR LAW FIRM, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800

By: 

Attorneys for Intervenor South Carolina
Telephone Coalition

September 25, 2007

Columbia, South Carolina

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Docket No. 2007-337-C

Re: Application of Sage Telecom, Inc. for a)
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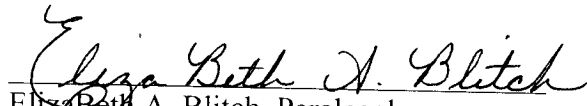
**CERTIFICATE OF
SERVICE**

SEP 25 2007
11 49 AM
FBI - COLUMBIA

I, ElizaBeth A. Blitch, do hereby certify that I have this date served one (1) copy of the foregoing Petition to Intervene upon the following party of record by causing said copy to be deposited with the United States Mail, first class postage prepaid to:

Bonnie D. Shealy, Esquire
Robinson, McFadden & Moore, P.C.
Post Office Box 944
Columbia, South Carolina 29202

Florence P. Belser, Esquire
Office of Regulatory Staff
Post Office Box 11263
Columbia, South Carolina 29211.


ElizaBeth A. Blitch, Paralegal
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September 25, 2007

Columbia, South Carolina